AIAM

April 5, 2004

Mr. Stephen R. Kratzke
Associate Administrator for Rulemaking
National Highway Traffic Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Ref: Docket No. NHTSA-2003-15715
Occupant Crash Protection (Frontal Offset Testing)

Dear Mr. Kratzke,

The Technical Affairs Committee of the Association of International Automobile Manufacturers, Inc. (AIAM)[1] provides the attached comments in response to the NHTSA Request for Comments on Occupant Crash Protection (69 FR 5108).

Should you have any questions regarding this submission, please contact me at 703/525-7788 ext. 233.

Sincerely,

Michael X. Cammisa
Director, Safety

cc: Roger Saul, NVS-110
John Lee, NVS-112
Docket Management

BUCKLE UP AMERICA
There's Just Too Much To Lose

[1] *AIAM Technical Affairs Committee members are Aston Martin, Ferrari/Maserati, Honda, Hyundai, Isuzu, Kia, Nissan, Peugeot, Renault, Subaru, Suzuki, Bosch, Delphi, Denso, and Hitachi.*

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Comments of the
Technical Affairs Committee of the
Association of International Automobile Manufacturers, Inc. (AIAM)
in Response to the Request for Comments Issued by
the National Highway Traffic Safety Administration (NHTSA)
on Occupant Crash Protection/Frontal Offset Crash Testing

Docket No. NHTSA-2003-15715

April 5, 2004

The Technical Affairs Committee of the Association of International Automobile Manufacturers, Inc. (AIAM)[1] appreciates the opportunity to provide its views in response to NHTSA's February 3, 2004, Request for Comment on frontal offset crash testing. We will address herein several general matters relating to the offset test and defer to our members' individual comments with regard to the specific questions asked in NHTSA's notice.

AIAM fully supports NHTSA's efforts to address the issue of lower extremity injuries in frontal crashes. However, we believe that the crash test data presented by the agency in the Request for Comment and the data from the additional tests mentioned in the notice justifies a cautious approach in considering the adoption of a frontal offset crash test requirement. In particular, we observe that the data show instances of injury measures increasing in the struck vehicle for every type of striking vehicle tested (passenger car, minivan, SUV, and pick-up) when comparing the older and newer designs of the striking vehicle, raising questions regarding possible safety disbenefits resulting from design measures that are intended to improve offset crash performance.

As a general matter, lower extremity injuries resulting from occupant compartment intrusion in crashes could be addressed by some strengthening of vehicle front ends, provision of additional crush space in the frontal area, improved front end designs (including the use of deployable crash compatibility devices), more occupant-friendly interiors, lower extremity airbag or padding designs, or some combination of those approaches. NHTSA has pointed out that the front-end strengthening approach could lead to increased aggressivity in crashes, potentially creating offsetting safety disbenefits for occupants of struck vehicles (69 Fed. Reg. 5112). Moreover, these design approaches could result

[1]AIAM Technical Affairs Committee members are American Honda Motor Co., American Suzuki Motor Corp., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Nissan North America, Inc., and Subaru of America. Associate members include Aston Martin Lagonda of North America, Inc., Delphi Corporation, Denso International America, Inc., Ferrari North America, Inc., Hitachi Automotive Products (USA), Maserati North America, Inc., Peugeot Motors of America, Renault, SA, and Robert Bosch Corporation.

in the addition of significant forward weight, possibly causing adverse effects in terms of vehicle handling and fuel efficiency.

We urge the agency to allow adequate time for the development of new strategies to reduce the potential for lower extremity injuries in crashes, so that strategies may be developed that minimize any offsetting disbenefits in crash performance, handling, fuel efficiency, or other areas. The agency should also continue its efforts to develop a new crash test protocol that assesses both intrusion-related harm and crash aggressivity.

We wish to point out that efforts planned by the industry to address the crash compatibility concern can be expected in the future to reduce concerns relating to aggressivity. The industry's December 2003 commitments on crash compatibility include plans to enhance the geometric matching of front structural components of automobiles, with 100 percent of new light vehicles produced by the signatories complying with the new performance criteria by September of 2009. The industry has also committed to assess dynamic test protocols for enhanced structural interaction and to evaluate methods for determining an appropriate balance between small vehicle interior compartment strength and large vehicle energy absorption characteristics. These efforts can be expected over time to achieve significant reductions in lower extremity injuries in frontal crashes.